REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed October 6, 2006. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

1. Response to Rejection of Claims under 35 U.S.C. § 102 (e)

Claims 1 and 3-25 have been rejected under 35 U.S.C. § 102(e) as being anticipated by *Vidyanand* (U.S. Patent No. 6,967,728). Applicants respectfully traverse this rejection.

It is axiomatic that "[a]nticipation requires the disclosure in a single prior art reference of each element of the claim under consideration." *W. L. Gore & Associates, Inc. v. Garlock, Inc.*, 721 F.2d 1540, 1554, 220 USPQ 303, 313 (Fed. Cir. 1983). Therefore, every claimed feature of the claimed invention must be represented in the applied reference to constitute a proper rejection under 35 U.S.C. § 102(e).

In the present case, not every feature of the claimed invention is represented in the *Vidyanand* reference. Applicants discuss the *Vidyanand* reference and Applicants' claims in the following.

a. Claim 1

As provided in independent claim 1, Applicants claim:

> A method comprising: ***receiving a user selection of one or more non-printer-specific print options via a network service, wherein the one or more non-printer-specific print options are identified for subsequent resolution, and wherein the one or more non-printer-specific print options can be applied to a plurality of other network services, the non-printer-specific print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more print non-printer-specific options submitted with a print request to the printer where the one or more non-printer-specific options are used in printing a document.***

(Emphasis added).

Applicants respectfully submit that independent claim 1 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at

least "receiving a user selection of one or more non-printer-specific print options via a network service, wherein the one or more non-printer-specific print options are identified for subsequent resolution, and wherein the one or more non-printer-specific print options can be applied to a plurality of other network services, the non-printer-specific print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more print non-printer-specific options submitted with a print request to the printer where the one or more non-printer-specific options are used in printing a document," as recited and emphasized above in claim 1.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for a particular connected printer 26." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are specific to a particular printer 26, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52. As such, *Vidyanand* does not disclose a selection of one or more non-printer-specific print options.

Accordingly, *Vidyanand* fails to teach or suggest "receiving a user selection of one or more non-printer-specific print options via a network service, wherein the one or more non-printer-specific print options are identified for subsequent resolution, and wherein the one or more non-printer-specific print options can be applied to a plurality of other network services, the non-printer-specific print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more print non-printer-specific options submitted with a print request to the printer where the one or more non-printer-specific options are used in printing a document," as recited in claim 1. (Emphasis added). Therefore, claim 1 is

not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

b. Claims 3-4

Because independent claim 1 is allowable over the cited art of record, dependent claims 3-4 (which depend from independent claim 1) are allowable as a matter of law for at least the reason that the dependent claims 3-4 contain all the steps and features of independent claim 1. For at least this reason, the rejection of claims 3-4 should be withdrawn.

Additionally and notwithstanding the foregoing reasons for allowability of claims 3-4, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Accordingly, the rejections to these claims should be withdrawn.

c. Claim 5

As provided in independent claim 5, Applicants claim:

> One or more computer readable media having stored thereon a plurality of instructions that, when executed by one or more processors, causes the one or more processors to perform acts including:
> communicating a plurality of possible print options to a client computer;
> receiving a user indication of selected ones of the plurality of possible print options;
> receiving an identifier, indicated by the user, associated with the selected print options;
> saving the selected print options with the associated identifier; and
> ***making the selected print options subsequently available to the user for configuring of a plurality of printers in a particular manner, the particular manner defined by the one or more print options submitted with a print request to a respective one of the plurality of printers where the one or more print options are used in printing a document, wherein each of the plurality of print options is not specific to a particular printer.***

(Emphasis added).

Applicants respectfully submit that independent claim 5 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at

least "making the selected print options subsequently available to the user for configuring of a plurality of printers in a particular manner, the particular manner defined by the one or more print options submitted with a print request to a respective one of the plurality of printers where the one or more print options are used in printing a document, wherein each of the plurality of print options is not specific to a particular printer" as recited and emphasized above in claim 5.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for <u>a particular connected printer 26</u>." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are <u>specific to a particular printer 26</u>, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52. As such, *Vidyanand* does not disclose a selection of one or more non-printer-specific print options.

Accordingly, *Vidyanand* fails to teach or suggest "making the selected print options subsequently available to the user for configuring of a plurality of printers in a particular manner, the particular manner defined by the one or more print options submitted with a print request to a respective one of the plurality of printers where the one or more print options are used in printing a document, wherein each of the plurality of print options is not specific to a particular printer," as recited in claim 5. Therefore, claim 5 is not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

d. Claim 6-8

Because independent claim 5 is allowable over the cited art of record, dependent claims 7-8 (which depend from independent claim 5) are allowable

as a matter of law for at least the reason that the dependent claims 7-8 contain all the steps and features of independent claim 5. For at least this reason, the rejection of claims 7-8 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability of claims 7-8, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record.

Claim 6 is canceled without prejudice, waiver, or disclaimer, and therefore, the rejection to the claim is rendered moot. Applicants take this action merely to reduce the number of disputed issues and to facilitate early allowance and issuance of other claims in the present application. Applicants reserve the right to pursue the subject matter of the canceled claim in a continuing application, if Applicants so choose, and do not intend to dedicate any of the canceled subject matter to the public.

    e.   <u>Claim 9</u>

As provided in independent claim 9, Applicants claim:

> A graphical user interface comprising:
> a plurality of portions illustrating user-selectable non-printer-specific
> print options and graphical mechanisms via which a user can select the print options;
> an additional user-input mechanism via which the user can input an identifier of the selected non-printer-specific print options; and
> another graphical mechanism via which the user can indicate a desire to save the selected non-printer-specific print options as associated with the identifier and for subsequent provision to a plurality of printers, ***the print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a respective one of the plurality of printers where the one or more non-printer-specific print options are used in printing a document.***

(Emphasis added).

Applicants respectfully submit that independent claim 9 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at

least "the print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a respective one of the plurality of printers where the one or more non-printer-specific print options are used in printing a document," as recited and emphasized above in claim 9.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for <u>a particular connected printer 26</u>." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are <u>specific to a particular printer 26</u>, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52.

Accordingly, *Vidyanand* fails to teach or suggest "the print options serving to configure a printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a respective one of the plurality of printers where the one or more non-printer-specific print options are used in printing a document," as recited in claim 9. Therefore, claim 9 is not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

f.   Claims 10-14

Because independent claim 9 is allowable over the cited art of record, dependent claims 10-14 (which depend from independent claim 9) are allowable as a matter of law for at least the reason that the dependent claims 10-14 contain all the features of independent claim 9. For at least this reason, the rejection of claims 10-14 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability of claims 10-14, these

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claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Accordingly, the rejections to these claims should be withdrawn.

g. <u>Claim 15</u>

As provided in independent claim 15, Applicants claim:

One or more computer readable media having stored thereon a plurality of instructions that, when executed by one or more processors, causes the one or more processors to perform acts including:
receiving an indication of one of a plurality of sets of non-printer-specific print options to be used in printing a document irrespective of a printer on which the document is to be printed, the non-printer-specific print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a printer where the one or more non-printer-specific print options are used in printing the document;
receiving an indication of one of a plurality of printers on which the document is to be printed; and
communicating the indicated set of non-printer-specific print options to the indicated printer irrespective of whether the printer supports one or more of the non-printer-specific print options identified in the set of non-printer-specific print options.

(Emphasis added).

Applicants respectfully submit that independent claim 15 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at least "receiving an indication of one of a plurality of sets of non-printer-specific print options to be used in printing a document irrespective of a printer on which the document is to be printed, the non-printer-specific print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a printer where the one or more non-printer-specific print options are used in printing the document," as recited and emphasized above in claim 15.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for <u>a particular connected</u>

<u>printer 26</u>." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are <u>specific to a particular printer 26</u>, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52.

Accordingly, *Vidyanand* fails to teach or suggest "receiving an indication of one of a plurality of sets of non-printer-specific print options to be used in printing a document irrespective of a printer on which the document is to be printed, the non-printer-specific print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more non-printer-specific print options submitted with a print request to a printer where the one or more non-printer-specific print options are used in printing the document," as recited in claim 15. Therefore, claim 15 is not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

h.   Claims 16-18

Because independent claim 15 is allowable over the cited art of record, dependent claims 16-18 (which depend from independent claim 15) are allowable as a matter of law for at least the reason that the dependent claims 16-18 contain all the features of independent claim 15. For at least this reason, the rejection of claims 16-18 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability of claims 16-18, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Accordingly, the rejections to these claims should be withdrawn.

i.   <u>Claim 19</u>

As provided in independent claim 19, Applicants claim:

> A system comprising:
> a network interface configured to allow the system to communicate with one or more other systems via a network; and
> a printer configuration user interface, communicatively coupled to the network interface, wherein the printer configuration user interface is configured to allow a user of a client interface to select print options and group the selection together as a configuration associated with a particular name, and wherein the printer configuration user interface is further configured to allow the user to select print options without regard for print options supported by a printer that the user can subsequently print to, ***the print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more print options submitted with a print request to the printer where the one or more print options are used in printing the document, wherein each of the plurality of print options is not specific to a particular printer.***

(Emphasis added).

Applicants respectfully submit that independent claim 19 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at least "the print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more print options submitted with a print request to the printer where the one or more print options are used in printing the document, wherein each of the plurality of print options is not specific to a particular printer," as recited and emphasized above in claim 19.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for <u>a particular connected printer 26</u>." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are <u>specific to a particular printer 26</u>, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer

preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52.

Accordingly, *Vidyanand* fails to teach or suggest "the print options serving to configure the printer in a particular manner for printing, the particular manner defined by the one or more print options submitted with a print request to the printer where the one or more print options are used in printing the document, wherein each of the plurality of print options is not specific to a particular printer," as recited in claim 19. Therefore, claim 19 is not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

j.   Claims 20-21

Because independent claim 19 is allowable over the cited art of record, dependent claims 20-21 (which depend from independent claim 19) are allowable as a matter of law for at least the reason that the dependent claims 20-21 contain all the features of independent claim 19. For at least this reason, the rejection of claims 20-21 should be withdrawn. Additionally and notwithstanding the foregoing reasons for allowability of claims 20-21, these claims recite further features and/or combinations of features (as is apparent by examination of the claims themselves) that are patentably distinct from the cited art of record. Accordingly, the rejections to these claims should be withdrawn.

k.   Claim 22

As provided in independent claim 22, Applicants claim:

> A method, implemented in a print service coupled to a network, the method comprising:
> *receiving, from a device in the network, a print request identifying both a document to be printed and a set of desired non-printer-specific print options, wherein the set of desired non-printer-specific print options includes a corresponding setting for one or more of the desired non-printer-specific print options;*

checking whether a printer corresponding to the print service supports the desired non-printer-specific print options; and

for each option in the set of desired non-printer-specific print options,

applying the setting corresponding to the option if the printer supports the non-printer-specific print option, and

ignoring the setting corresponding to the option if the printer does not support the non-printer-specific print option.

(Emphasis added).

Applicants respectfully submit that independent claim 22 is allowable for at least the reason that *Vidyanand* does not disclose, teach, or suggest at least "receiving, from a device in the network, a print request identifying both a document to be printed and a set of desired non-printer-specific print options, wherein the set of desired non-printer-specific print options includes a corresponding setting for one or more of the desired non-printer-specific print options," as recited and emphasized above in claim 22.

Rather, *Vidyanand* discloses at most a "printer driver control interface [that] allows sets 16 to be defined and reused for a particular connected printer 26." Col. 6, lines 6-14 (Emphasis added). "As well, within the entire set of printer driver categories 47a-47n is typically a printer specific subset 49b of settings 47j-47n which are specific to a particular printer 26, based on the feature set 28 (i.e., the capabilities) of that printer 26 (e.g., duplex, sorting, finishing options)." Col. 5, lines 54-59. As such, *Vidyanand* teaches that preferences specific to a particular printer may be transferred to and reused by another printer. For example, *Vidyanand* describes that a "set 16 of printer preferences 18 . . . is defined on the first client computer 12a, and is specified to perform a particular type of print job 21 at the first printer 26a." Col. 8, lines 49-52.

Accordingly, *Vidyanand* fails to teach or suggest "receiving, from a device in the network, a print request identifying both a document to be printed and a set of desired non-printer-specific print options, wherein the set of desired non-printer-specific print options includes a corresponding setting for one or more of the desired non-printer-specific print options," as recited in claim 22. Therefore, claim 22 is not anticipated by *Vidyanand*, and the rejection should be withdrawn for at least this reason alone.

2.   Response to Rejection of Claims under 35 U.S.C. § 103(a)

Claim 2 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Vidyanand* in view of *Yanagidaira* (U.S. Patent No. 6,490,052). Applicants respectfully traverse this rejection.

Claim 2 is allowable is allowable over the cited art of record for at least the reason that claim 2 contains all the features on independent claim 1 and *Yanagidaira* does not remedy the deficiencies of the *Vidyanand* reference.

CONCLUSION

For at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned agent at (770) 933-9500.

Respectfully submitted,

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